

EXHIBIT B

**JASON CARDIFF
MOTION TO
SUPPRESS**

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9 JASON EDWARD THOMAS CARDIFF

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 JASON EDWARD THOMAS
CARDIFF,

17 Defendant.
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Case No. 5:23-CR-00021-JGB

**DECLARATION OF JASON
CARDIFF IN SUPPORT OF
MOTION TO SUPPRESS
EVIDENCE FROM ILLEGAL
SEARCH AND SEIZURE**

*[Filed concurrently with Notice of
Motion and Motion to Suppress
Evidence and [Proposed] Order]*

DECLARATION OF JASON CARDIFF

I, Jason Cardiff, declare as follows:

1. I am a party in the above-entitled action. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration in support of Defendant's Motion to Suppress Evidence From Illegal Search and Seizure.

2. This declaration is submitted under the protections of *Simmons v. United States*, 390 U.S. 377 (1968) and the United States Constitution. Pursuant to *Simmons* and my constitutional rights, I would object to the use of this declaration for any purpose beyond the Court's adjudication of my Motion to Dismiss Indictment with Prejudice.

3. On October 12, 2018, I was present at the Redwood Scientific Technologies offices located Building address 820 North Mountain Avenue, Suite 100, Upland, CA 91786, and Building address 870 North Mountain Avenue, Suites 115 and 118, Upland, CA 91786.

4. I was at one of Redwood's offices, 870 Mountain Avenue that day when I noticed cars parked outside 820 North Mountain Avenue, where my office was located. I walked over to see what was going on. I observed officers from the Upland Police Department and agents from the United States Postal Inspection Service (USPIS) inside the premises of Suite 100, 820 North Mountain Avenue. I also met the Receiver, who identified himself to me as Brick Kane. Prior to that time, I was unaware of any criminal investigation taking place regarding me at that time.

5. Redwood's offices were not open to the public. The office's doors were kept locked during business and after hours. *Id.* Computers were assigned to specific employees. *Id.* at 10. Access into each computer was password protected and additional password protection was provided for certain programs allowing

1 customer access and access to financial records. *Id.* Most computers were recycled
2 and used by different employees over the years.

3 (a) All three Redwood's office suites contained numerous personal and
4 private items belonging to me, including personal (non-business) notes,
5 family memorabilia, health reports, and religious items. Additionally, I
6 had stored several electronic devices, such as hard drives, laptops,
7 iPads, and tablets, in boxes labeled "Suite 100" and "Suite 115," which
8 likely contained private emails, correspondence, and personal data.

9 (b) Some of the specific items seized are described in an inventory
10 provided by the USPIS. This inventory is described in a Memo to File
11 by Postal Inspector Christine Reins-Jarin and Gen Quon dated July 6,
12 2021. A true and correct copy is attached as **Exhibit 1**. Most of my
13 personal items were located in Suite 100 throughout the office.

14 6. The computers located at my work desk and other electronic devices
15 within the office also housed personal items and data accumulated over several
16 years. These computers contained non-Redwood related documents, including
17 family documents and personal identification information, including but not limited
18 to personal tax returns, family photos, documents relating my children, health care
19 information, personal family documentation, legal issues unrelated to Redwood or
20 the FTC and business notes unrelated to the FTC or Redwood.

21 7. Throughout the day, I spent most of my time with Brick Kane and
22 Robb Evans of Robb Evans & Associates, the appointed receiver. At no time was I
23 asked for permission or consent to search the premises or my personal items. I was
24 not shown or provided with a search warrant at any time. Additionally, Brick Kane
25 did not, at any time, request my permission to allow law enforcement to search the
26 premises.

27 8. On October 12, 2018, I sat with the Receiver and provided various
28 items, including Google and login credentials for computers and systems in the

1 office, as well as the code to the office safe.

2 9. While I was with the Receiver, I sat in the corporate office, which had
3 five private offices and an open workspace. We were in full view of all offices in
4 that space. I personally observed USPIS agents walking freely around Suite 100.
5 While I was present, the computers were already turned on. I saw USPIS agents
6 inspecting items, picking up objects, looking through documents and were accessing
7 and reading information on the computers as well as reviewing hard copy files and
8 rummaging through file cabinets in the office. I was also introduced to the FTC
9 attorney who was present that morning along with FTC staff.

10 10. At no time did I grant consent or authorize any of the search and
11 seizure of documents and things from Redwood's offices. This includes but is not
12 limited to searches conducted by Government agents after October 12, 2018.

13 11. At all relevant times, I was President, Chief Executive Officer and
14 majority shareholder of Redwood Scientific Technologies, Inc.

15 12. On March 3, 2022, the Court ordered a Final Judgment Including
16 Permanent Injunction as to Cardiffs and a Final Judgment Including Permanent
17 Injunction as to Redwood Scientific Technologies, Inc.

18 13. The orders effectively returned Redwood to its shareholders and
19 majority shareholder, and further allows Redwood and Cardiff to resume
20 manufacturing and distributing thin strip over the counter medication subject to
21 prior testing specified in the Final Judgments.

22 14. This is a summary of my testimony. I reserve the right to supplement
23 and/or clarify if called as a witness at trial.

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1 15. I declare under penalty of perjury that the foregoing is true and correct.
2 28 U.S.C. § 1746.

3 Executed on this 9th day of September, 2024, at Kingwood, Texas.

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5
6 
7 Jason Cardiff

EXHIBIT 1

Left Side of Storage Unit (while facing the brick wall)

Plastic tub on ground	-Prolongz research studies book -CDs, including ministry related; Mona Vie; Advanced Medical Institute; and People United for Christians binders (many pre-2014 documents)
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Frames on top of tub	-PTO framed "Be the Dragon" S/N 86-326 024 -books/pamphlets on Sumusent and Prolongz
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Bankers Boxes
Stack 1 (from top to bottom)

Box 1 Redwood, Ste 100, Room J, Eunjung Cardiff	-folder labeled for Jason Cardiff's Ireland passport and citizenship -pre-2014 tax return information
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Box 2 Redwood, Ste 100, Room J, Eunjung Cardiff, Chief Marketing Officer Executive	-EKS&H independent audit reports -Nationwide 2016/2017 (box also contains pre-2014 documents)
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Box 3 Redwood, Ste 100, Room H Jason Cardiff	-appears to contain majority pre-2014 docs
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Box 4 Redwood, Ste 100, Room H Jason Cardiff	-vintage Playboy magazines -2015 HSBC statements -old KMG and RAP sheets
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Box 5

Redwood, Ste 100, Room H,
Jason Cardiff

- notice to pay rent from Mountain Grove Office Park
- Bisno and Mulvaney envelopes
- Massachusetts Medical filing paperwork
- Yellowstone Capital merchant agreement
- numerous notebooks with notes
- PUFC Donations-Vancouver checkbook pad

Stack 2 (top to bottom)

Brown box – Cigirex
(not bankers box)

- appears to be pre-2014 Kelly Media Group and bank statements

Box 1

Redwood, Ste 100, Room B,
Section 4 (Vault) Part 6 final

- Clover Strip products in boxes

Box 2

Redwood, Ste 100, Room F,
Section 11B, 11C

- 2015 Citi records
- 2015 HSBC statements

Box 3

Redwood, Ste 100, Room D,
Section 1A, 1B

- Citi statements American Nutra Partners
- 2016 Run Away Products Citi statements
- 2016 Cigirex Citi
- Wage Lock

Box 4

Redwood, Ste 100, Room D,
Section 8B, 8C

- misc. docs folders
- GNC
- W-9 2016
- Dalian
- Public/Board docs
- SunTrust
- 2017 W2
- 2017 941s

Stack 3 (top to bottom)

Box 1

Redwood, Ste 100, Room B
Section 4 (vault) partial 5 -Clover Strip product

Box 2

Redwood, Ste 100, Room B
Section 4 (vault) partial 3 -Clover Strip product

Box 3

Redwood, Ste 100, Room D
Section 1A
-LegalZoom binders for Expo Supplements,
Messengers for Christ World Healing
Center, TV Sales
-ANP and Nature's Future binders and docs
-CBD file folder
-Redwood files

Redwood, Ste 100, Room D
Section 2C, 3B, 3C, 6A
-Provaxaltonin booklet
-employee files
-PUFC files
-GNC
-Clover CC
-notebooks

Box 5

Redwood, Ste 100, Room D
Section 6A, 6B
-office memos
-bill logs
-2017 payroll

Stack 4 (top to bottom)

Box 1

Redwood, Ste 100, Room B
Section 4 (vault) partial 2 -Clover Strip product

Box 2 Redwood, Ste 100, Room D Section 8A	-misc files -employee files -taxpayer ID with copies/voided checks
Box 3 Redwood, Ste 100, Room D Section 1A	-Advanced Men's Institute, Cigirex, Top Hill Shop, Smoke Stop, Ax Distributors binders
Box 4 Redwood, Ste 100, Room D Section 1C, 1D, 2A, 2B	-RST Certified USPS letters -RAP, AMI, ANP checkbooks, binders -Wage Lock docs -RST investor presentation binders – Feb 2015
Box 5 Redwood, Ste 100, Room F Section 4B, 5	-investor binders -agreements – Walgreens, CVS, Target -Prolongz reseller -Five9 -Owl Enterprises bank account forms -BDirect -Triple Scoop
Stack 5 (top to bottom)	
Box 1 Redwood, Ste 100, Room B Section 4 (vault) partial 4	-Clover product
Box 2 Redwood, Ste 100, Room F Section 11A, 11B	-Citi statement binders (appears to be 2014 and after)
Box 3 Redwood, Ste 100, Room F Section 1, 2, 3, 4A	-merchant statements – TBX-Free, Exp Trans 1969 -merchant statements RAP Citi 7881 -Bank of the West -AMI UPS merchant statements

Box 4
Redwood, Ste 100, Room F
Section 11D

- Citi statements
- BancTek
- Humboldt merchant services

Box 5
Redwood, Ste 100, Room D
Section 3, 3A

- binders with investor information, such as copies of driver's licenses
- AZ Corp. Comm.-Leverage Media (KMG related)
- RST subscription agreement/investor letter
- RAP binder
- PayDay Workforce binder
- PPM and other older docs

Stack 6 (top to bottom)

Box 1
Redwood, Ste 100, Room B
Section 1, 2, 3, 4 (vault) partial
1, 5

- TV Sales checks
- PUFC Donations-Vancouver checkbook binder
- PUFC (Upland) docs, checks

Box 2
Redwood, Ste 100, Room E
Section 5C, 5D

- 2017 banks docs
- RST binder

Box 3
Redwood, Ste 100, Room D
Section 1B

- RST private placement binders
- Citibank statements
- LegalZoom- Am. Source Supply Direct Retail Supply Dist.

Box 4
Redwood, Ste 100, Room D
Section 3A, 6A

- RST agreements folder
- investor questionnaire folder

Box 5
Redwood, Ste 100, Room F
Section 6, 7, 8, 9, 10, 11A

- 2015 bank statements
- 1099K folder – 2015

Stack 7 (top to bottom)

Box 1 Redwood, Ste 100, Room B Section 7, 7A, 7B, 7C	-PUFC docs, donation info, mail room letters
Box 2 Redwood, Ste 100, Room F Section 11C	-PUFC Citi statements - 2012, 2014 -AMI 2014 binder -RAP 2015 binder
Box 3 Redwood, Ste 100, Room E Section 1A, 1B, 5A, 5B, 5C, 5D	-Canna. Oral Thin Film LLC -merchant services docs folder -PUFC statements -Redwood payroll -inventory log folder -chargeback folder
Box 4 Redwood, Ste 100, Room A, Section 5, 5A, 5B, 6, 7, 7A, 7B Room B, Section 1 and 2	-approx. 7 plastic bags with PUFC donation checks, money orders -Redwood catalog/binder

(4) white boxes on floor in front of brick wall stacks of boxes labeled as - Hard Drives, Ste 100, Room E, Drawer 1B

Against Brick Wall

Stacks from Right Side
to Left Side

"Do Not Destroy Per Danielle 1/16"	-716 Valparaiso docs -insurance -escrow docs (most appear pre-2014)
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"RAP 2015"

- folder labeled "IRS" with "Edward Thomas Ministries" – 2012
- Carol's Secret Garden
1525 W. 13th #G, Upland, CA 91786
(909) 946-0333
- Citi 1368
- folder labeled – donations for Lights On
- HSBC and JPMC
- handyman and pest control

Third box
(no label/writing)

- "Focus Your Faith" tabs
- PUFC projects – folders

Bottom box
blue/white Staples
box with RST mailing
label

- RST payroll 2015, etc.
- possible audit documents request list
- cash disbursements ~2011-2016
- account transactions
- Canella

Stack 2

"Star Scientific vs. Cigirex
LLC"

- binders 12-CV-7969 GW (Ex)

Second box
red/white Office Depot
box

- Prolongz consumer complaints
- AG cases – folder; letters
- Paul Lewis
- Cash Your Gold – folder
- wine license – folder
- Veterans Affairs (dated 2009)
re: TriEmerald
Attn: Ms. Judy Warren
re: VA lender ID 902029-00-00
- Cash Your Gold

**

- some docs with/from Thaler Law

Third box
red/white Office Depot
box

- Canella
- fixed asset info kiosk
- Citi 7471
- warehouse – customer refunds 2016
- employee files
- bank records

Stack 3

First box
“RST 2016 A/P”

- financial docs
- folders - Code Clouds, Bentley, 4DQ
- employee files
- TV Sales – IRS 2016
- City of Ontario
- VoiceGenix

Second box
red/white Office Depot
box

- Wellnex vs. KMG
- Feed the Children – binders
- Fast Forward Media
- First Choice Media
- Cigirex
- (many/most appear to be pre-2014)

Third box
red/white Office Depot
box

- Jason Cardiff Bank of America settlements (**possible info w/ Rhonda Jo Pearlman)
- DMS payroll 2010
- Hillard letter procedures
- PUFC 2014 payroll

Fourth box
“RAP 2015” with
(2)

- “Jasons Personals” labeled folder
- RAP 2013 taxes, bills
- TMobile; QBE Ins.
- Red Hill Country Club – labeled folder
- RAP July 2015 bills

Fifth box

"Bishop Alex Pastor
Hillard New Light/Telecom
Wellenex chargeback"

-Hillard / Bynum docs
(appears most pre-2014)

Stack 4

First box

Staples box
(no lid; red folders on top)

-Valparaiso escrow papers
-Heckler vs. Cigirex
-Cigirex; Wage Lock
-BBB Folder with accreditation AML, with
stickers
** -Thaler Law binder/folders

Second box

Staples box with
"C6" post-it

-legal docs
-Star Scientific vs. Cigirex
-KMG Canada

Third box

"RAP & PUFC 2016"

-2016 poss. lawsuit paperwork
-poss. employee docs (has direct deposit
docs, copies of DL, applications ~2015)
-folders labeled misc.

Fourth box

red/white Office Depot
box with "C7" post-it

-binder/book – med./food/cosmetics
-NJ Cigirex
-KMG taxes (pre-2014)
-settlement Beal and KMG
-RAP EDD

Fifth box

Bottom box w/ stain on lid; red/white Office Depot box

- ** -Bisno/Mulvaney envelopes
- log-in info labeled folder
- Heckler vs. Cigirex
- GNC
- FDA/England
- TBX-Free draft label with notes
- Dalian - ingredients list
- terms and conditions – labeled folder
- customer service and chargebacks – labeled folder
- ** -TBX-Free info/UK with RJP edits
- USPTO labeled folder re: 2015 PUFC vs. PUFC
- InterMedia
- Cigirex lawsuit – summons
- ** -state bar re: RJP
- ** -RJP folders

Stack 5

First box

Staples box, no lid (sheets w/ clear protect.)

- sample letters 2015

Second box

Ripped, no lid
"Cigirex 2015"

- Cigirex docs

Third box

Ripped Staples box
"Shred"

- "Edward Thomas Ministries" red box binder
- 2014 PUFC
- employee files
- Cigirex binders
- Prolongz binders

Fourth box

Office Depot box (blue tabs; purple folders)

- Citi, BofA, AmEx - ~2015, 2016

Brown box on
ground
"C5" post-it

- AMI Media 2015
- “Trademark Abandonment” labeled
folder re: Wage Lock
- terminated employees folders
- Cigirex related
- payroll 2015

Second row from brick wall – computer row

Brown box w/ red tape
“Ste 115 Room A
A1 Storage
Loose Hard Drives”

“drives” written on box

White box
“Redwood, Ste 100
Laptops, iPads, Tablets”

Right Side (when facing the brick wall)

Second stack closest
to brick wall

“Ste 100 Room C Storage”
(on top of clear boxes)

-external drive

First stack closest to
brick wall

Clear tub on top -2012/2013 RAP binders; Cigirex
-AL copies for copyright 2014 PUFC

Clear tub 58Qt -Riley Aviation
-pre-2014 docs
-brown cardboard box inside with
Redwood docs; merchant services; "Master
Profit"
-PUFC pre-2014

Clear tub -appears to be pre-2014 KMG, etc.

Second Stack

Clear tub
"Suite 118 Room B
Section: 7A, 7B" -Clover related docs
-reimbursement docs; Sandy Westergren
-PUFC letters/campaigns
-letter pay sheets
-Customs and Border Protection sheets
-Proforma invoices – labeled folder

Clear tub with blue lid -Cash Your Gold and Word Network binders

Large tub -appears to be ministry related binders

Right side, tubs closest to
roll up door

Clear tub on left	-UPS receipts -employee docs -employee schedule -BBB letters -binder w/ note containing social media info/sites; training binder -merchant service docs
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Clear tub on right	-appears to be pre-2014 docs
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Second Row

Clear tub, top left	-RST parcels -TBX binders -Cannabis related docs
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Clear tub, top right	-ministry related docs
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Clear tub, bottom	-appears to be pre-2014 ministry related Docs
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Christine Reins-Jarin
U.S. Postal Inspector

July 7, 2021

Date

